

Exhibit “B”



McMANIMON • SCOTLAND • BAUMANN

75 Livingston Avenue, Roseland, NJ 07068 (973) 622-1800

November 8, 2023

Commodity Futures Trading Commission

Invoice #: 215532
Client #: 15292
Matter #: 1
Billing Attorney: AS1

INVOICE SUMMARY

For Professional Services Rendered Through October 31, 2023.

RE: A. Sodono, Receiver

Total Professional Services	\$ 214,446.50
Less 20% Discount	<u>\$ -42,889.30</u>
Net Professional Services	\$ 171,557.20
Total Disbursements	<u>\$ 1,804.33</u>
TOTAL THIS INVOICE	\$ 173,361.53

**PROFESSIONAL SERVICES**

Date	Atty	Description	Hours	Amount
8/29/23	AS1	Analyze emails and pleadings including Complaint, Motion, and Order for Preliminary Injunction; draft memo of issues	3.40	2,363.00
8/29/23	DP	Update file with multiple emails and Complaint, Motion, and Order for Preliminary Injunction; review Order and Complaint and prepare outline for Receiver	2.20	517.00
8/30/23	AS1	Discuss shut-down of businesses and accounts and turnover issues with Sari B. Placona	.50	347.50
8/30/23	AS1	Call with Sari B. Placona, Diane Perrotta, and A. Calascibetta re: status and retention of Eisner as accountant to Receiver	.20	139.00
8/30/23	AS1	Call with CFTC (Ashley Burden, Elizabeth Streit, and Katherine Paulson), Sari B. Placona, and Diane Perrotta re: case background and strategy	1.20	834.00
8/30/23	DP	Participate in conference call with CFTC (Ashley Burden, Elizabeth Streit, and Katherine Paulson), Anthony Sodono, III, and Sari B. Placona re: case background and strategy	1.00	235.00
8/30/23	DP	Follow-up call with Anthony Sodono, III and Sari B. Placona re: strategy/next steps	.20	47.00
8/30/23	DP	Conference call with Anthony Sodono, III, Sari B. Placona, and A. Calascibetta re: status and retention of Eisner	.10	23.50
8/30/23	DP	Prepare retention pleadings including application, certification of Sari B. Placona, certification of Anthony Calascibetta, and proposed order; communicate with Anthony Sodono, III	2.10	493.50
8/30/23	DP	Review and update file with CFTC freeze letters to WooCommerce, Deel, and BMO	.20	47.00
8/30/23	SBP	Call with Eisner re: case	.10	59.50
8/30/23	SBP	Follow up call re: strategy with A. Sodono and D. Perrotta	.20	119.00
8/30/23	SBP	Zoom call with A Burden, K Paulson, E Streit, A Sodono and D Perrotta	1.20	714.00
8/30/23	SBP	Review emails, complaint, motion and order	1.20	714.00
8/31/23	AS1	Telephone call with C. Gallo re: shutting down Twitter and relates sites	.20	139.00
8/31/23	AS1	Call with Sari B. Placona, Diane Perrotta, and D. Lucas of Ascendia Bank re: accounts, protection of funds	.20	139.00
8/31/23	AS1	Analyze pleadings including CFTC Order, Complaint, and Motion; CFTC freeze letters; OSC letter to Receivership Defendants; OSC Temporary Order; OSC Freeze Directions; CFTC Order on Expedited Discovery; CFTC letter to Kazmi serving pleadings and discovery; Deposition Notice on Kazmi; CFTC Subpoenas to WooCommerce and Automattic and iSAM Securities; CFTC press release; myforexfunds.com redirect to announcement page	3.40	2,363.00
8/31/23	AS1	Communicate with Sari B. Placona re: transfer of funds to Kazmi's father's company and document request	.20	139.00
8/31/23	DP	Review emails and OSC letters and prepare Contact List of parties	.20	47.00



Date	Atty	Description	Hours	Amount
8/31/23	DP	Review OSC and CFTC freeze letters; prepare List of Assets	1.10	258.50
8/31/23	DP	Begin application for Receiver's Tax ID number; email to A. Burden re physical address of NJ entity	.20	47.00
8/31/23	DP	Review and update file with multiple email exchanges with CFTC Team re websites; discuss with Sari B. Placona re: same and serving notice	.30	70.50
8/31/23	DP	Conference call with CFTC Team, Sari B. Placona, Mike, Kelly, and Lauren Goddard re: iS Risk re: halting trading and document production	.20	47.00
8/31/23	DP	Conference call with CFTC Team, Sari B. Placona, and Paul Sieminski re: wire of funds to Receiver and document production	.20	47.00
8/31/23	DP	Review of file and compile documents received to date; prepare index and binder of same; communicate with Anthony Sodono, III	1.20	282.00
8/31/23	DP	Research and process request business status/information through NJ Gateway for Traders Global NJ	.30	70.50
8/31/23	SBP	Review emails with freeze letters; review emails from A. Burden to Automattic and M. Kelly re: Is Risk; call with A. Burden, E. Streit, and K. Paulson re same; draft emails to Automattic and Is Risk to shut down	1.30	773.50
9/01/23	AS1	Communicate with Sari B. Placona re sealing documents; communicate with A. Calascibetta re security books and records and discuss infrastructure	.40	278.00
9/01/23	AS1	Communicate with J. McDaniels, C. Dull (ConnectOne) re: accounting team (Actual time .50)	.30	208.50
9/01/23	AS1	Communicate with D. Lucas (Ascendia Bank) re: protection of funds	.20	139.00
9/01/23	AS1	Review and analyze emails with A. Burden, E. Streit, P. Sieminsky, H. Hogan, and Sari B. Placona re GoDaddy site, transaction sites; analyze Order to Show Cause and dealings with WooCommerce	1.10	764.50
9/01/23	AS1	Review A. Burden email re corporate authority, removal of principal, and deadlines under order; discuss with Sari B. Placona	.20	139.00
9/01/23	AS1	Communicate with C. Kelly, Controller, re setting up trust/escrow account re transfer of funds and protection of same as fiduciary	.20	139.00
9/01/23	AS1	Discuss with Sari B. Placona communicate with Kazmi; review email to Kazmi re cease and desist, compelling certain action	.20	139.00
9/01/23	AS1	Review K. Paulson email to M. Kelly (iS Risk) serving subpoena; discuss with Sari B. Placona; review expedited discovery order	.30	208.50
9/01/23	AS1	Review and analyze discovery served by CFTC including deposition notice to Kazmi, subpoenas to iS Risk, WooCommerce/Automatic, and Deel; draft memo of issues	.80	556.00
9/01/23	AS1	Communicate with counsel re litigation hold, securing assets, books and records, and similar issues	.20	139.00
9/01/23	AS1	Communicate with Sari B. Placona re Kazmi deposition, drafting outline of issues	.20	139.00
9/01/23	SBP	Email GoDaddy re shutdown of website; email M Kelly re is Risk Inc.; review websites for my forex funds;	.60	357.00



Date	Atty	Description	Hours	Amount
9/01/23	SBP	Review order on expedited discovery; review subpoena to wooCommerce; email Kazmi re MFF website	.40	238.00
9/01/23	SBP	Calls with A Sodono re status of woo commerce, is risk, assets etc ; email P Siemensi re transfer of funds	.60	357.00
9/01/23	SBP	Call with is risk counsel, D Perrotta, and CFTC	.40	238.00
9/01/23	SBP	Call with P Siemensi re wire and transfer of funds	.30	178.50
9/01/23	SBP	Call with A Burden, D Perrotta re P Siemensi and WooCommerce discovery; follow up call with P Siemensi	.30	178.50
9/01/23	SBP	Call with CFTC and Canadian counsel	.30	178.50
9/05/23	AS1	Draft and revise application to retain professionals; discuss with Sari B. Placona and Accountant	.40	278.00
9/05/23	AS1	Meeting with Sari B. Placona, Diane Perrotta, and Stacy Lipstein re strategy and status, outline of issues (Actual time 1.50)	1.30	903.50
9/05/23	AS1	Telephone call to A. Caslascibetta re books and records, duties of Accountant	.20	139.00
9/05/23	AS1	Telephone call to D. Lucas to discuss asset protection and interest-bearing accounts	.20	139.00
9/05/23	AS1	Call with Robert Zink, Matt Feibert, and Mike Shaheen	.60	417.00
9/05/23	AS1	Call with Sari B. Placona, A. Burden, and K. Paulson regarding status & issues regarding assets	.40	278.00
9/05/23	AS1	"Open positions" email notional position issues	.20	139.00
9/05/23	AS1	Communicate with J. Rabinowitz re account deposits, FDIC protection, and interest	.30	208.50
9/05/23	AS1	Analyze and revise litigation hold letter; discuss with Sari B. Placona	.80	556.00
9/05/23	AS1	No Charge - Communicate with E. Halilovic re transfer and protection of funds with Connect One	.20	N/C
9/05/23	AS1	Communicate with Sari B. Placona re District Court hearing summary of issues	.30	208.50
9/05/23	AS1	Communicate with P. Sieminski re disbursing/access to Stripe account	.20	139.00
9/05/23	DP	Meeting with Anthony Sodono, III, Sari B. Placona, and Stacy Lipstein re status/strategy including assets, etc., immediate actions	1.50	352.50
9/05/23	DP	Prepare and e-file Notices of Appearance by Anthony Sodono, III, and Sari B. Placona	.30	70.50
9/05/23	DP	Review and update file with Summonses returned executed against all defendants	.20	47.00
9/05/23	DP	Review and update file with email from R. Fink, US counsel to Receivership Defendants; revise party list to include	.20	47.00
9/05/23	DP	Email to GoDaddy with 8/29/2023 Order	.10	23.50
9/05/23	SBP	Meeting with A Sodono, D Perrotta, and S Lipstein re strategy	1.50	892.50
9/05/23	SBP	Draft litigation hold letter to defendants; review court order (Actual time 1.30)	.70	416.50



Date	Atty	Description	Hours	Amount
9/05/23	SBP	Call with R Zink, M Feibert, M Shaheen and A Sodono re requests, demands, etc.	.60	357.00
9/05/23	SBP	Call with A Burden, K Paulson and A Sodono re defense counsel	.40	238.00
9/05/23	SBP	Call with H Wong, A Sodono, A Burden and K Paulson re status of assets and Canadian proceeding	.60	357.00
9/06/23	AS1	Meeting with Sari B. Placona re document requests, insurance, order for living expenses, local rule on bank approval/work out consent with defendants	.30	208.50
9/06/23	AS1	Communicate with CFTC re payment order for living expenses and other related items	.20	139.00
9/06/23	AS1	Analyze CFTC subpoenas to iS Risk, WooCommerce, Automattic, and Deel; discuss with Sari B. Placona	.60	417.00
9/06/23	AS1	Review A. Burden emails to M. Kelly re trading date; discuss with Sari B. Placona	.20	139.00
9/06/23	AS1	Meeting with Sari B. Placona re P. Siemenski and WooCommerce turnover of funds and M. Kelly and iS Risk; summary of issues and status/strategy	.60	417.00
9/06/23	AS1	Communicate with S. McLeod re Canadian hearings	.20	139.00
9/06/23	AS1	Communicate with J. Copeland re OSC issues	.30	208.50
9/06/23	AS1	Call with Sari B. Placona, A. Burden, K. Paulson, D. Speas, and M. Shaheen re injunction and related issues	.40	278.00
9/06/23	DP	Revise and finalize litigation hold letter to R. Zink; compile relevant documents; email to R. Zink with same	.90	211.50
9/06/23	DP	Review Notice of Appearances by counsel for Receivership Defendants; prepare master Service List	.30	70.50
9/06/23	DP	Review and update file with CFTC filing of exhibits in support of motion for preliminary relief	2.10	493.50
9/06/23	SBP	Draft bullet points for court hearing on status	.20	119.00
9/06/23	SBP	Revise litigation hold letter	.20	119.00
9/06/23	SBP	Communicate with GoDaddy re domain sites	.10	59.50
9/06/23	SBP	Attend status conference hearing	.40	238.00
9/06/23	SBP	Review rule 45 subpoenas to is Risk, Deedl, and WooCommerce	.30	178.50
9/06/23	SBP	Draft subpoenas to defendants	1.30	773.50
9/07/23	AS1	Call with Neil of Stripe re transfer of funds	.30	208.50
9/07/23	AS1	Review order appointing Temporary Receiver, extending SRO	.20	139.00
9/07/23	AS1	Meeting with Sari B. Placona re demand letters and production of documents	.30	208.50
9/07/23	AS1	Review R. 45 Subpoenas to Traders Global US and Canada; discuss with Sari B. Placona	.40	278.00
9/07/23	AS1	Call with Michele M. Dudas, Sari B. Placona and Stripe re turnover of funds	.30	208.50



Date	Atty	Description	Hours	Amount
9/07/23	DP	Call with Anthony Sodono, III, Sari B. Placona, and Norton Fulbright US (Eric Daucher and James Copeland) and Canadian (Linda Fuerst and Evan Cobb) re background and strategy	.60	141.00
9/07/23	DP	Review and update file with entered Order extending SRO and Continuing PI Hearing to 9/19/2023	.10	23.50
9/07/23	DP	Revise, finalize, and e-file Temporary Receiver's application (and certifications, proposed order, and certification of service) to employ MS&B as counsel and Eisner as accountants; email to parties serving same	.80	188.00
9/07/23	DP	Research process for Tax ID Number for Receiver and prepare SS-4	.30	70.50
9/07/23	DP	Conference call with Anthony Sodono, III, and Sari B. Placona re status including turnover of funds, websites, retaining special counsel and claims agent	.30	70.50
9/07/23	MMD	Review background information relating to temporary receivership; call with A. Sodono and S. Placona re: securing assets; call with counsel to Stripe; review various e-mails relating to same	1.20	714.00
9/07/23	SBP	Call with proposed Ontario counsel	.60	357.00
9/07/23	SBP	Call with WooCommerce legal counsel and A Sodono re funds	.30	178.50
9/07/23	SBP	Review exhibits and A Burden Declaration in support of SRO	.40	238.00
9/07/23	SBP	Call with Ashley Burden re defendants' assets	.30	178.50
9/07/23	SBP	Call with Stripe counsel, A Sodono and M Dudas re funds	.30	178.50
9/07/23	SBP	Email Bank of Montreal re accounts closing	.20	119.00
9/08/23	AS1	Meeting with Sari B. Placona re Stripe, BMO turnover of funds and procedure	.30	208.50
9/08/23	AS1	Meeting with Michele M. Dudas, Sari B. Placona, and Diane Perrotta re Confirмо issues, transfer of funds, Connect One and Ascendia accounts	.40	278.00
9/08/23	AS1	Communicate with F. Vinopal of CONFIRMO re turnover	.20	139.00
9/08/23	AS1	Call with Tracy Talbot, Stripe counsel, re chargebacks, turnover of funds	.20	139.00
9/08/23	AS1	Review and communicate A. Burden and D. Speas re injunction, documents, and related issues	.20	139.00
9/08/23	AS1	No Charge - Communicate with J. Waldron claims agent	.20	N/C
9/08/23	AS1	Meeting with Michele M. Dudas, Sari B. Placona, Diane Perrotta, and Colin Gallo re various website issues, GoDaddy and other sites transfer funds	.50	347.50
9/08/23	AS1	Communicate with H. Borbett re Edward Jones accounts	.20	139.00
9/08/23	AS1	Communicate with Sari B. Placona re BMO funds; communicate with Schmidt re turnover of funds	.30	208.50
9/08/23	AS1	Review various emails with Michele M. Dudas and D. Speas and A. Burden re Kazmi, log-in credentials	.20	139.00
9/08/23	AS1	Call with Sari B. Placona, A. Burden, and D. Speas re various issues	.30	208.50



Date	Atty	Description	Hours	Amount
9/08/23	AS1	Call with Norton Rose (Canadian and NY counsel) re Crypto issues, hearings in Canada and jurisdiction; post call discussion with MSB Team on strategy	.80	556.00
9/08/23	AS1	Call with Michele M. Dudas re GoDaddy process; communicate with GoDaddy re information	.30	208.50
9/08/23	AS1	Review emails with A. Burden and J. Engel re Stripe chargeback issues	.20	139.00
9/08/23	AS1	Meeting with C. Gallo and Michele M. Dudas re website and redirection; review website addresses	.30	208.50
9/08/23	AS1	Communicate with Sari B. Placona re BMO US funds turnover	.20	139.00
9/08/23	DP	Conference call with Anthony Sodono, III, Michele M. Dudas, Sari B. Placona and O. Polanco re strategy re turnover of funds, Receiver website, redirect of Defendants' websites, domain holders	.60	141.00
9/08/23	DP	Review Court's Text Order re 9/12/2023 deadline for Defendants to object to TR's retention of counsel and accountants; calendar	.10	23.50
9/08/23	DP	Conference call with Anthony Sodono, III, Sari B. Placona and Norton Rose Team (J. Copeland, E. Daucher, L. Fuerst, and E. Cobb) re Canadian assets, OSC, recovery of crypto assets	.80	188.00
9/08/23	JHR	Call with A Sodono and M Dudas re access to have website redirect information to Receiver and counsel. Need to set up system to respond to creditor inquires.	.30	168.00
9/08/23	MMD	Various calls with Receiver and professionals; e-mails and call to GoDaddy re: transfer of website; participate in conference call with Ontario Securities Commission; continue review of background information in pleadings; review various e-mails re: same	2.80	1,666.00
9/08/23	MXT	Researched time to respond to subpoena.	.20	54.00
9/08/23	SBP	Call with defense counsel and CFTC	.80	476.00
9/08/23	SBP	Emails to Stripe, defense counsel and Bank of Montreal re assets	.20	119.00
9/08/23	SBP	Call with Jan re Bank of Montreal funds	.20	119.00
9/08/23	SBP	Call with H Wong and OSC counsel and A Sodono M Dudas and D Perrotta re freeze orders	.30	178.50
9/08/23	SBP	Communicate with L Fuerst and J Copeland (Canadian counsel for Receiver) re OSC freezes	.20	119.00
9/08/23	SBP	Call with Is Risk counsel and CFTC re document production	.30	178.50
9/08/23	SBP	Review CFTC letters from 9.1.23 and 9.7.23 to defendants re non compliance and SRO	.20	119.00
9/08/23	SBP	Review emails from CFTC re Stripe status	.20	119.00
9/08/23	SBP	Review application of OSC for extension of TRO	.40	238.00
9/08/23	SBP	Call with proposed Canadian counsel (for Receiver)	.90	535.50
9/08/23	SBP	Email BMO Harris Bank NA re funds	.20	119.00
9/08/23	SBP	Call with K Paulson re cross border issues	.20	119.00
9/08/23	SBP	Review emails re redaction requests	.20	119.00



Date	Atty	Description	Hours	Amount
9/08/23	SBP	Revise subpoena attachment	.20	119.00
9/08/23	SBP	Calls to Bank of Montreal	.20	119.00
9/08/23	SBP	Review letter from iS Risk to CFTC with documents	.20	119.00
9/08/23	SBP	Strategy team call re assets	1.10	654.50
9/09/23	DP	Review Doc. No. 23 (documents in support of initial motion) including Declarations of A. Burden, M. Edelstein, and D. Malinowski; ledger of email exchanges with iS Risk and Defendants; employment agreements; Contract of Sale for Richmond Hill; and deposition transcript of Matthew Chichester of iS Risk; prepare notes re same; communicate with Anthony Sodono, III	2.90	681.50
9/10/23	AS1	Teams Meeting with Sari B. Placona re order to show cause, sanctions, and contempt of SRO	.40	278.00
9/10/23	AS1	Review A. Burden emails re chargeback issues with Stripe	.20	139.00
9/11/23	AS1	Draft letter to Defendants' counsel re missing items	.50	347.50
9/11/23	AS1	Conference call with Michele M. Dudas, Sari B. Placona, Diane Perrotta, A. Burden, K. Paulson, L. Fuerst, and E. Cobb re various receivership issues	.90	625.50
9/11/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and Diane Perrotta re CFTC follow-up strategy and punchlist items	.40	278.00
9/11/23	AS1	Draft email to D. Speas re insurance, website, turnover; discuss with Sari B. Placona	.30	208.50
9/11/23	AS1	Participate in conference call with Michele M. Dudas, Sari B. Placona, Diane Perrotta, Ashley Burden, and Kate Paulson re status including Defendants' lack of production of document under SRO, possible motion to compel/letter to court, obtaining CA counsel, crypto/bank accounts	1.10	764.50
9/11/23	DP	Participate in conference call with Anthony Sodono, III, Michele M. Dudas, Sari B. Placona, Ashley Burden, and Kaate Paulson re status/strategy including Defendants' lack of cooperation, possible motion to compel/letter to court, TR obtaining CA counsel, crypto/bank accounts	1.10	258.50
9/11/23	DP	Follow-up call with Anthony Sodono, III, Michele M. Dudas, and Sari B. Placona re strategy	.30	70.50
9/11/23	DP	Draft letter to Judge Quraishi requesting conference call re Defendants' lack of cooperation; communicate with Anthony Sodono, III; revise letter; email to A. Burden with "draft" letter for review/comment	.40	94.00
9/11/23	GWM	Comms with Malcolm Thorpe re: research as to parameters/limitations of Anthony Sodono as receiver.	.20	106.00
9/11/23	GWM	Review underlying emails with counsel re: Malcolm Thorpe research.	.40	212.00
9/11/23	GWM	Comms with Anthony Sodono re: litigation support.	.20	106.00
9/11/23	MMD	Attempt to access Defendants' bank accounts; review BMO accounts; obtain account information for 9 accounts and draft summary of findings; report to Temporary Receiver	1.40	833.00



Date	Atty	Description	Hours	Amount
9/11/23	MMD	Call with Ashley Burden, Katherine Paulson, A. Sodono, S. Placona and D. Perrotta re: review and response of counsel to Defendants and related issues	1.10	654.50
9/11/23	MMD	Review response of counsel to Defendants re: passwords and access to accounts; conferences with Temporary Receiver, S. Placona and D. Perrotta re: actions to be taken, including user names; confer with C. Gallo re: redirecting website	1.00	595.00
9/11/23	MMD	Call with counsel from Norton Rose, A. Burden, K. Paulson, A. Sodono, S. Placona and D. Perrotta re: retention of Canadian counsel and related issues, including crypto currency issues	.80	476.00
9/11/23	MXT	No Charge - Researched requirements of service of subpoena. (Actual time .30)	.20	N/C
9/11/23	MXT	Researched circumstances in which a temporary receiver can be compelled to request turnover of funds in reserve merchant account. (Actual time 3.20)	1.20	324.00
9/11/23	SBP	Review task list with Canadian counsel	.20	119.00
9/11/23	SBP	Review letter from R Zink re Defendants' information	.10	59.50
9/11/23	SBP	Review email from Edward Jones re bank account	.10	59.50
9/11/23	SBP	Call with J Waldron re potential claims agent	.10	59.50
9/11/23	SBP	Communicate with L Schmidt re BMO funds in U.S.	.10	59.50
9/11/23	SBP	Call with A Sodono, M Dudas, and D Perrotta re websites and accounts	.30	178.50
9/11/23	SBP	Call with CFTC and A Sodono, D Perrotta, and M Dudas re Defendants' letter with passwords, assets, etc	1.10	654.50
9/11/23	SBP	Review email with A Burden re Stripe; email A Burden re BMO accounts	.20	119.00
9/11/23	SBP	Call with CFTC, A Sodono, M Dudas, D Perrotta, and proposed Canadian counsel	.90	535.50
9/11/23	SBP	Call with A Sodono, D Perrotta, and M Dudas re Stripe, assets, etc.	.50	297.50
9/11/23	SBP	Draft email to Dakota in response to letter	.20	119.00
9/12/23	AS1	Call with Sari B. Placona, L. Fuerst, J. Copeland, and E. Cobb re Czech account crypto/US dollars and related issues	.80	556.00
9/12/23	AS1	Call with Sari B. Placona re letter to court; communicate with Defendants' counsel re information and subpoena	.30	208.50
9/12/23	AS1	Meeting with Malcolm Thorpe re Stripe turnover/chargebacks and possession/research	.20	139.00
9/12/23	AS1	Communicate with A. Burden re Confirimo funds/crypto wallet transfer	.20	139.00
9/12/23	AS1	Review emails with F. Vinopal re turnover of funds from Confirimo	.20	139.00
9/12/23	AS1	Review and respond to emails with Ahnaf Ahmed Mahee (rxzincoz529@gmail.com); forward to A. Burden	.20	139.00
9/12/23	AS1	Conference call with Team and D. Speas re insurance, accessing accounts and two-factor authentications, websites, Stripe chargebacks, living expenses, retainer paid to counsel, service of subpoenas, Defendants' moving to modify SRO	.80	556.00



Date	Atty	Description	Hours	Amount
9/12/23	DP	Revise/finalize Form SS-4 for TR Tax ID No.; fax to IRS	.20	47.00
9/12/23	DP	Draft retention pleadings for Norton Rose Fulbright US and CA including application, proposed order, and certification of service; email exchange with J Copeland re certifications	.70	164.50
9/12/23	DP	Participate in conference call with TR's Team and D. Speas re insurance, accessing accounts and two-factor authentications, websites, Stripe chargebacks, living expenses, retainer paid to counsel, service of subpoenas, Defendants' moving to modify SRO	.70	164.50
9/12/23	JHR	Reviewed Restraining Order and Appointing Receiver, reviewed Complaint. (Actual time 1.10)	.40	224.00
9/12/23	MMD	Conduct review of personal BMO bank account, BitBuy bank account, CIBC account, GoDaddy account (coordinate with C. Gallo) and Confirмо account; provide summaries to Receiver	1.30	773.50
9/12/23	MMD	Call with Dakota Speas, counsel to Defendants, A. Sodono, S. Placona and D. Perrotta re: additional access information; continue call with D. Speas re: two factor authentication and access to bank accounts	1.10	654.50
9/12/23	MMD	Review various e-mails from Defendants' counsel re: insurance policies and call to confer re: website; begin drafting blurb for website	.70	416.50
9/12/23	MXT	Meeting with AS to discuss issues related to receiver's ability to compel turnover of reserves.	.20	54.00
9/12/23	MXT	Reviewed docket to assist in research efforts to identify ways in which a receiver can compel funds from an account reserve. (Actual time 1.10)	.20	54.00
9/12/23	SBP	Call with Norton Rose re Confirмо account and crypto	.80	476.00
9/12/23	SBP	Prepare chart of My Forex Funds complaints	.20	119.00
9/12/23	SBP	Call with defense counsel, A Sodono, M Dudas, E Daucher,	.80	476.00
9/12/23	SBP	Revise letter to defense counsel	.10	59.50
9/12/23	SBP	Communicate with E Halilovic re Receiver bank account	.10	59.50
9/12/23	SBP	Communicate with Dakota re assets; communicate with Confirмо re funds	.30	178.50
9/13/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and D. Speas re various issues, Stripe, chargebacks, consensual expenses settlement	.90	625.50
9/13/23	AS1	Analyze Bitbuy account summary; communicate with E. Daucher to discuss turnover of funds; analyze draft memo to Coinbase	.70	486.50
9/13/23	AS1	Review "myforexfunds" URL	.20	139.00
9/13/23	AS1	Communicate with OSC re vehicle titles, insurance, and license plates	.30	208.50
9/13/23	AS1	Communicate with L. Feurst re freeze order, District Court order, and turnover	.20	139.00
9/13/23	AS1	Communicate with Michele M. Dudas and E. Cobb re Bitbuy account and OSC	.30	208.50
9/13/23	AS1	Analyze draft language on website	.20	139.00
9/13/23	AS1	Call with E. Daucher, Sari B. Placona, and D. Speas re various issues	.20	139.00



Date	Atty	Description	Hours	Amount
9/13/23	AS1	Call with E. Cobb re OSC proceedings	.20	139.00
9/13/23	AS1	Analyze insurance policies	.30	208.50
9/13/23	AS1	Communicate with L. Schmidt re BMO freeze accounts and credits only	.20	139.00
9/13/23	AS1	Call with Michele M. Dudas, L. Fuerst, J. Copeland, E. Cobb, and E. Daucher re Coinbase, security assets	.30	208.50
9/13/23	AS1	Draft email re transfer of records	.20	139.00
9/13/23	AS1	Communicate with Michele M. Dudas re GoDaddy and related accounts	.30	208.50
9/13/23	AS1	Conference call with Michele M. Dudas, Sari B. Placona, Malcolm Thorpe, and Ashley Burden re strategy on transfer of funds	.90	625.50
9/13/23	DP	Review emails from D. Speas with insurance information; update file with policies and home appraisal provided; review OSC freeze directive for vehicles; prepare list of issues--missing coverage and additional real estate	.80	188.00
9/13/23	DP	Prepare chart of insured property; circulate to MSB Team	1.10	258.50
9/13/23	DP	Email to D. Speas "myforexfunds" URL for www.myforrexfunds.com	.10	23.50
9/13/23	MMD	Call with Canadian special counsel and Temporary Receiver re: Bitbuy and related access issues to transferring of funds from account; review proposed e-mail to Coinbase	.50	297.50
9/13/23	MMD	Address issues relating to GoDaddy website and hosting services login; confer with C. Gallo re: same and relay information to Temporary Receiver	.60	357.00
9/13/23	MMD	Call with counsel to Defendants, Temporary Receiver and his counsel re: access to websites, insurance and account information	.70	416.50
9/13/23	MMD	Review issues relating to BitBuy legal and restrictions on account	1.10	654.50
9/13/23	MMD	Call with A. Burden, A. Sodono and S. Placona re: open issues and access to additional bank accounts	.30	178.50
9/13/23	MXT	Intraoffice conference call with CFTC, AS, SP, MD regarding strategy. (Actual time .90)	.30	81.00
9/13/23	MXT	Continued review of underlying pleadings and orders.	.50	135.00
9/13/23	SBP	Call with D Speas, M Dudas, A Sodono, and E Daucher re crypto accounts	.80	476.00
9/13/23	SBP	Email Stripe re accounting; review stipulation to extend SRO; communicate with OSC re insurance; revise subpoenas to defendants; review owned plates for Lamborghini	1.60	952.00
9/13/23	SBP	Call with E Cobb, A Sodono, and M Dudas re BitBuy and Confirмо	.40	238.00
9/13/23	SBP	Review insurance documents	.20	119.00
9/13/23	SBP	Communicate with A West re CIBC funds	.10	59.50
9/13/23	SBP	Call with A Burden, A Sodono, M Thorpe re defense call	.90	535.50
9/13/23	SBP	Discuss Stripe with A Sodono	.10	59.50
9/14/23	AS1	Teams call with Michele M. Dudas, Sari B. Placona, and Diane Perrotta re strategy; post discussion with Michele M. Dudas	.80	556.00



Date	Atty	Description	Hours	Amount
9/14/23	AS1	Call with Michele M. Dudas, Sari B. Placona, Ashley Burden, and Kate Paulson re chargebacks, websites, passwords, fund transfer, Colin re website/expenses for MA Kazmi; OSC issues	1.20	834.00
9/14/23	AS1	Meet with Michele M. Dudas re various websites, bank accounts, and Bitbuy; discuss with Colin Gallo	.40	278.00
9/14/23	DP	Review and update file entered Order authorizing TR to employ counsel and accountants; prepare letter serving same; email to Counsel with letter and order	.40	94.00
9/14/23	MMD	Revise blurb for redirected website; confer with Receiver re: same	1.20	714.00
9/14/23	MMD	Review various e-mails from defense counsel, counsel to Stripe and special counsel re: various matters; respond re: GoDaddy issue	.20	119.00
9/14/23	MMD	Confer with Receiver, S. Placona and D. Perrotta re: status of various matters and actions to be taken; follow up call with A. Burden re: status	1.50	892.50
9/14/23	MXT	Researched whether a motion may be filed on short time.	1.30	351.00
9/14/23	MXT	Continued researching whether a Receiver can compel turnover of non-party merchant reserve account funds to receiver.	1.60	432.00
9/14/23	SBP	Call with A Sodono, M Dudas, and D Perrotta re status of items	.30	178.50
9/14/23	SBP	Call with A Sodono, M Dudas, D Perrotta, and A Burden re status of assets	1.20	714.00
9/14/23	SBP	Call with A Burden re transfer of assets	.10	59.50
9/14/23	SBP	Communicate with counsel re insurance and websites	.20	119.00
9/14/23	SBP	Review email from D Speas re website and crypto accounts; review email from E Daucher to coinbase	.20	119.00
9/15/23	AS1	Review D. Speas letter re Stripe, chargebacks, process, procedure	.30	208.50
9/15/23	AS1	Review and communicate with J. Engel re Stripe and chargebacks	.20	139.00
9/15/23	AS1	Communicate with E. Daucher re Coinbase and Confirmit; discuss with Michele M. Dudas and E. Daucher Gemini and CDO strategy	.40	278.00
9/15/23	AS1	Communicate with Michele M. Dudas and Colin Gallo re website changes and spreadsheet population and analysis	.50	347.50
9/15/23	AS1	Communicate with D. Speas and email reply; forward to A. Burden; analyze constitutionality of order, prejudgment and attachment and seizure; review case law (Actual time 1.40)	.90	625.50
9/15/23	CG	Provision and configure temporary receivership website, update DNS entries to point to same (IT analysis)	1.80	423.00
9/15/23	DP	Telephone call with IRS re status of TR's SS-4 application; communicate with Anthony Sodono, III, re same	.20	47.00
9/15/23	DP	Review and update file with Order extending SRO and continuing PI hearing; calendar relevant dates	.20	47.00
9/15/23	MMD	Review position of Stripe and Woo Commerce re: chargebacks and access to funds	.30	178.50
9/15/23	MMD	Finalize issues relating to website; revise blurb; coordinate with C. Gallo; make multiple attempts to contact GoDaddy re: account hold	1.70	1,011.50



Date	Atty	Description	Hours	Amount
9/15/23	MMD	Review information from Defendants' counsel re: additional bank accounts; attempt to access Gemini accounts; call with counsel to Defendant re: same; relay information re : insurance and status; research information relating to CDO Markets	1.60	952.00
9/15/23	MXT	Continued researching whether a Receiver can compel turnover of non-party merchant reserve account funds to receiver and prepared writ up. (Actual time 2.30)	1.30	351.00
9/15/23	SBP	Review email from E Daucher to Coinbase; email D Speas re NJ insurance	.20	119.00
9/15/23	SBP	Review and edit blurb for Defendants website	.10	59.50
9/15/23	SBP	Review letter from M Tucci re WooCommerce chargebacks	.20	119.00
9/17/23	MMD	E-mail to Defendants' counsel re: access to CDO Markets; e-mail to special counsel re: accessing accounts; various e-mails from Temporary Receiver re: status of various matters; respond	.40	238.00
9/18/23	AS1	Communicate with Michele M. Dudas and D. Speas re GoDaddy and CDO Markets; post-call with Michele M. Dudas to discuss same	.50	347.50
9/18/23	AS1	Communicate with D. Speas re funds in account/expenses	.20	139.00
9/18/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and Diane Perrotta re strategy re Stripe, Confirmito, GoDaddy, CDO Market account, BMO, US, Coinbase, insurance	.70	486.50
9/18/23	AS1	Call with Michele M. Dudas, Sari B. Placona, Diane Perrotta, Ashley Burden, and Erich Daucher re Stripe, Confirmito, GoDaddy, Con, Gemini, CDO Market account, BMO, US, Coinbase, insurance	.50	347.50
9/18/23	AS1	Communicate with Michele M. Dudas re Coinbase and wallet, transfer of funds	.30	208.50
9/18/23	AS1	Call with D. Speas re various issues including chargebacks and expenses	.20	139.00
9/18/23	AS1	Meeting with IT Colin Gallo re website transfer and language design; exchange emails	.20	139.00
9/18/23	CG	Call w/GoDaddy and M. Dudas.	.50	117.50
9/18/23	DP	Review and update file with Quinn Emanuel pro hac declarations and proposed order	.20	47.00
9/18/23	MMD	Conference call with counsel to Stripe, E. Streit, K. Paulson and S. Placona re: reserve account; follow up call with Temporary Receiver and S. Placona re: same; conduct Accurint search; review information relating to Motion for turnover	1.70	1,011.50
9/18/23	MMD	Confer with A. Sodono, S. Placona and D. Perrotta re: status regarding various matters	.30	178.50
9/18/23	MMD	Call with E. Daucher, Ryan Ballantyne and Michael Cianfraro re: CoinBase account set up; follow up call with E. Daucher; provide information to Assignee and call re: same	1.20	714.00
9/18/23	MMD	Call with CFTC Team, A. Sodono, E. Daucher, S. Placona, D. Perrotta re: status and strategy; draft Declaration in support of Motion for contempt	.60	357.00



Date	Atty	Description	Hours	Amount
9/18/23	MMD	Review email response from GoDaddy re: locking of accounts; call with Laurie, GoDaddy Court disputes; follow up call with Laurie and C. Gallo to effectuate changes to website; summarize issues for Temporary Receiver and need to Subpoena GoDaddy	1.40	833.00
9/18/23	MMD	Call with Dakota Speas, A. Sodono and S. Placona re: Stripe and various issues; begin drafting Motion to compel Stripe to turn over funds	2.20	1,309.00
9/18/23	MXT	Continued researching whether a Receiver can compel turnover of non-party merchant reserve account fund and reviewed service terms for Stripe regarding same.	2.30	621.00
9/18/23	MXT	Phone conference regarding Stripe Reserves with AS, MD. SP.	.30	81.00
9/18/23	SBP	Zoom call with CFTC and team re status update and motion for contempt	.50	297.50
9/18/23	SBP	Review and revise application to retain Norton Rose	.30	178.50
9/18/23	SBP	Call with A Sodono and M Dudas re Stripe account	.90	535.50
9/18/23	SBP	Review research on Stripe reserve agreement	.30	178.50
9/18/23	SBP	Call with K Paulson re chargebacks	.20	119.00
9/18/23	SBP	Review email from D Speas re BMO US funds	.10	59.50
9/18/23	SBP	Review letter from D Speas re chargebacks with Stripe	.20	119.00
9/18/23	SBP	Call with Stripe legal team, A Sodono, M Dudas, and CFTC	.30	178.50
9/18/23	SBP	Review research re Stripe reserve account	.20	119.00
9/18/23	SBP	Team call re status of assets	.60	357.00
9/18/23	SBP	Call with A Sodono, D Speas, and M Dudas re Stripe account	1.00	595.00
9/18/23	SBP	Draft letter to D Speas in response to Stripe chargebacks	.30	178.50
9/18/23	SBP	Draft subpoena to Quinn Emanuel; draft subpoena to Stripe; review email from E Cobb re Bitbuy freeze order	.30	178.50
9/19/23	AS1	Call with Michele M. Dudas, Sari B. Placona, Ashley Burden, Beth Streit, and Kate Paulson re status conference	.20	139.00
9/19/23	AS1	Call with D. Speas re Stripe, expenses, and funds	.30	208.50
9/19/23	AS1	Call with Court re various issues	.50	347.50
9/19/23	AS1	Review Ravi declaration; discuss with Michele M. Dudas (Disclosure in compliance with SPR issues)	.30	208.50
9/19/23	AS1	Review CFTC contempt pleadings; discuss with Michele M. Dudas and Sari B. Placona	.70	486.50
9/19/23	AS1	Call with Michele M. Dudas and Sari B. Placona re preparing to District Ct. hearing and status of issue	.30	208.50
9/19/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and Ashley Burden re chargeback and expense resolution	.40	278.00
9/19/23	JHR	Calls with A Sodono and review of various correspondence from individuals requesting refunds. (Actual time .60)	.30	168.00
9/19/23	MMD	Draft e-mails to counsel to Defendants re: access to CDO Markets bank account and changing/access for GoDaddy websites	.20	119.00



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Date	Atty	Description	Hours	Amount
9/19/23	MMD	Review and analyze Defendants' request for modification of SRO; review Temporary Receiver comments re: same; review e-mails re: Canadian hearings scheduled for September 20; participate in District Court call; draft proposed form of Order and review proposed changes by counsel to Defendants	2.80	1,666.00
9/19/23	MMD	Review and redlined proposed changes to CFTC Motion for Contempt	.30	178.50
9/19/23	SBP	Communicate with L Fuerst re status of hearing with judge	.10	59.50
9/19/23	SBP	Review draft letter from Norton Rose to Gowling WLG re freeze orders	.10	59.50
9/19/23	SBP	Call with Norton Rose re Ontario conference and freeze orders	.20	119.00
9/19/23	SBP	Zoom call status conference with court; follow up call with Defendants	1.20	714.00
9/19/23	SBP	Team call in preparation for court status conference	.20	119.00
9/19/23	SBP	Review CFTC motion for contempt	.20	119.00
9/19/23	SBP	Review email from L Feurst re Canadian proceeding	.10	59.50
9/19/23	SBP	Review defendants' motion to modify SRO	.30	178.50
9/19/23	SBP	Email with Stripe re account; review order providing access to Stripe	.20	119.00
9/20/23	AS1	Call with D. Speas re expenses	.40	278.00
9/20/23	AS1	Draft email letter to D. Speas re explanation of expenses	.40	278.00
9/20/23	AS1	Call with CFTC re Stripe and budget	1.10	764.50
9/20/23	AS1	Communicate with D. Speas re expenses, invoices and supporting bills, funds in account	.30	208.50
9/20/23	AS1	Communicate with CFTC re expenses and order	.20	139.00
9/20/23	AS1	Call with Ontario Securities Commission	1.10	764.50
9/20/23	AS1	Draft memo to MSB Team re OSC hearing; discuss strategy	.30	208.50
9/20/23	AS1	Review Superior Court Justice Endorsement Ontario	.10	69.50
9/20/23	CG	Automate collection and centralization of website and email submissions. (Actual time 3.00)	1.50	352.50
9/20/23	CG	Website submissions aggregation and reporting. (Actual time 1.50)	1.10	258.50
9/20/23	JHR	Meeting with A Sodono and S Placona and C Gallo review of various correspondence from individuals requesting refunds, discussed strategy for responding to inquiries	.50	280.00
9/20/23	MMD	Call with CFTC, Temporary Receiver and S. Placona re: Stripe issues	.50	297.50
9/20/23	MMD	Review issues relating to budget proposed by Defendants	.20	119.00
9/20/23	MMD	Call with Temporary Receiver and S. Placona re: Stripe Order; finalize and submit to Chambers	.40	238.00
9/20/23	MMD	Review outcome of OSC hearing	.20	119.00
9/20/23	SBP	Discuss order re Stripe account with M Dudas and A Sodono; revise order; call with chambers re order	.50	297.50
9/20/23	SBP	Communicate with Norton Rose re budget for Kazmi; review budget	.20	119.00
9/20/23	SBP	Call with CFTC re Stripe and budget	1.10	654.50
9/20/23	SBP	Call with Dakota and A Sodono re budget and stripe issues	.50	297.50



Date	Atty	Description	Hours	Amount
9/20/23	SBP	Call with D Speas re budget	.30	178.50
9/20/23	SBP	Revise order modifying payment terms to receiver and professionals	.20	119.00
9/20/23	SBP	Revise subpoena to Quinn Emanuel; revise letter serving same	.20	119.00
9/20/23	SBP	Review proposed order for 30 day extension to file responsive pleading; review joint motion to extend deadline	.20	119.00
9/20/23	SBP	Review contempt motion by CFTC; communicate with Stripe	.20	119.00
9/20/23	SBP	Communicate with J Poland re affidavits for retention	.10	59.50
9/20/23	SBP	Review and revise affidavit of Receiver in support of retention applications	.50	297.50
9/20/23	SBP	Review Ontario endorsement	.10	59.50
9/20/23	SBP	Team meeting re receiver website and fielding customer emails; review email from D Speas re SRO; review court deadlines re motions	.40	238.00
9/20/23	SBP	Revise order for Receiver and professionals to receive payment	.10	59.50
9/20/23	SLL	Prepare receivers certification in support of MSB, Eisner and Norton's employment applications	1.00	235.00
9/21/23	WB	Intro meeting	.50	25.00
9/21/23	AS1	Communicate with D. Speas re various issues including chargebacks, expenses	.40	278.00
9/21/23	AS1	Call with CFTC and Team re Stripe	.80	556.00
9/21/23	AS1	Post call with Michele M. Dudas and Sari B. Placona re Stripe	.20	139.00
9/21/23	AS1	Review Defendants' opposition and exhibits	1.60	1,112.00
9/21/23	AS1	Communicate with D. Speas re website language	.50	347.50
9/21/23	AS1	Communicate with Michele M. Dudas re CDO Marakets	.30	208.50
9/21/23	AS1	Analyze 911 chargeback efficiency and cost; communicate with D. Speas re details; discuss with Michele M. Dudas	.30	208.50
9/21/23	AS1	Analyze limited opposition to TRO	.70	486.50
9/21/23	AS1	Communicate with D. Speas re Rafi affidavit	.20	139.00
9/21/23	JHR	Meeting with C Gallo review of various correspondence from individuals requesting refunds, discussed strategy for responding to inquiries.	.30	168.00
9/21/23	MMD	Obtain access to CDO Markets account and begin review of information; provide account balances to CFTC	.80	476.00
9/21/23	MMD	Participate in Case Management Conference and follow up call with CFTC, counsel to Defendants and counsel to Stripe re: settlement options	1.30	773.50
9/21/23	MMD	Follow up call with counsel to CFTC, Defendants and Stripe re: further settlement discussions	.70	416.50
9/21/23	MMD	Call with W. Baumann, D. Poland and S. Placona re: inquiries from victims from Receiver website; review revised proposed language by Defendants	.40	238.00



Date	Atty	Description	Hours	Amount
9/21/23	MMD	Review and analyze pleadings filed by Stripe, including opposition to Order and Motion to Intervene; discuss with Temporary Receiver and S. Placona	1.10	654.50
9/21/23	MMD	Review proposed Affidavit re: payment of retainer funds; draft e-mail to Temporary Receiver re: missing information	.20	119.00
9/21/23	SBP	Review stripe brief in opposition to proposed order for Stripe	.30	178.50
9/21/23	SBP	Review stripe motion to intervene	.30	178.50
9/21/23	SBP	Revise affidavit of Receiver in support of retention applications	.20	119.00
9/21/23	SBP	Review email from Norton Rose re budget	.10	59.50
9/21/23	SBP	Call with D Speas re receiver website and chargebacks	.40	238.00
9/21/23	SBP	Review budget backup documentation	.20	119.00
9/21/23	SBP	Revise subpoena to Stripe	.10	59.50
9/21/23	SBP	Revise order supplementing SRO re payment to professionals	.10	59.50
9/21/23	SBP	Court hearing on Stripe account; follow up call with parties to resolve issue	1.20	714.00
9/21/23	SBP	Call with receiver team, CFTC, Dakota Speas and Stripe	.80	476.00
9/21/23	SBP	Te call re website and fielding complaints	.30	178.50
9/22/23	AS1	Analyze responsive pleadings to Court; communicate with Michele M. Dudas re same	.60	417.00
9/22/23	AS1	Review complaint spreadsheet; discuss with Colin Gallo	.30	208.50
9/22/23	AS1	Teams Court hearing with Ontario Court Justice Steele; discuss with L. Feurst, E. Cobb, S. McLeod and H. Murray order to show cause	.60	417.00
9/22/23	AS1	Communicate with Michele M. Dudas and Sari B. Placona re form of Stripe order; review and revise same; communicate with D. Speas re same	.60	417.00
9/22/23	AS1	Communicate with D. Speas re expenses	.30	208.50
9/22/23	AS1	Post hearing call with L. Feurst and E. Cobb re process/procedure for securing funds	.30	208.50
9/22/23	AS1	Draft memo of position re budget, turnover, web traffic, crypto funds	.30	208.50
9/22/23	AS1	Review insurance endorsement and policy	.20	139.00
9/22/23	AS1	Review Quinn subpoena	.20	139.00
9/22/23	AS1	Call with Court and post call with all interested parties	1.30	903.50
9/22/23	AS1	Review and analyze chargeback guide	.40	278.00
9/22/23	AS1	Call with D. Speas re websites and Stripe	.20	139.00
9/22/23	AS1	Communicate with E. Daucher and F. Vinopar re funds in Slovak account, crypto transfer	.30	208.50
9/22/23	AS1	Analyze Defendants' motion to modify with supporting pleadings, declaration and exhibits	1.10	764.50
9/22/23	AS1	Communicate with D. Speas re website language; email exchange re same	.30	208.50



Date	Atty	Description	Hours	Amount
9/22/23	MMD	Revise Limited Objection to Motion to modify SRO filed by Defendants; draft Declaration of Temporary Receiver in support of same; review and analyze MOBE decision; review and analyze CFTC position on Motion	2.40	1,428.00
9/22/23	MMD	Review proposal by Defendants re: access to Stripe; discuss response with Temporary Receiver; review position of CFTC; draft detailed counterproposal and discuss with Receiver	.80	476.00
9/22/23	MMD	Call with D. Speas re: access to Gemini account and CIBC access; review Gemini account; review CIBC accounts and analyze credit card charges as compared to budget issues; attempt to export CDO Market account information	1.70	1,011.50
9/22/23	MMD	Call with E. Daucher, special counsel re: issue whether Confirмо funds can be turned over as USD; discuss issue with Temporary Receiver; provide E. Daucher with wire instructions; review e-mail from E. Daucher to Confirмо re: same	.40	238.00
9/22/23	MMD	Review issues relating to GoDaddy website and alleged additional access	.30	178.50
9/23/23	MMD	Review response of counsel to Defendants re: terms for chargeback access; provide temporary receiver with analysis and response	.40	238.00
9/24/23	AS1	Review customer emails (Domenick Kiss and Mate Bazco) re claims	.10	69.50
9/24/23	MMD	Confer with Temporary Receiver re: various outstanding issues; draft initial response re: chargebacks; review issues relating to website and discuss with Temporary Receiver	.80	476.00
9/25/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and Stripe re strategy/website	.60	417.00
9/25/23	AS1	Call with Sari B. Placona re Stripe	.30	208.50
9/25/23	AS1	Call with Michele M. Dudas and Sari B. Placona re Confirмо, Stripe, website language	.40	278.00
9/25/23	AS1	Communicate with Michele M. Dudas re email draft to D. Speas re chargebacks and expenses	.70	486.50
9/25/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and Ashley Burden re Stripe	.30	208.50
9/25/23	AS1	Analyze A. Burden email re chargeback resolution; discuss with Michele M. Dudas and Sari B. Placona	.30	208.50
9/25/23	AS1	Communicate with Colin Gallo re setting up website creating spreadsheet	.30	208.50
9/25/23	AS1	Communicate with Michele M. Dudas and D. Speas re website, additional websites, goplus, etc.	.30	208.50
9/25/23	AS1	Call with Michele M. Dudas, Sari B. Placona, Ashley Burden, and Kate Paulson re various issues including expenses, clawbacks, payments, transfer, accounts	.70	486.50
9/25/23	AS1	Post call with Michele M. Dudas re clawbacks, payments, transfer, accounts	.20	139.00



Date	Atty	Description	Hours	Amount
9/25/23	MMD	Call with D. Speas, A. Sodono and S. Placona re: status of various issues outstanding from Defendants, including chargebacks, expenses and website information	1.30	773.50
9/25/23	MMD	Call with representatives of the CFTC re: status of various issues	.70	416.50
9/25/23	MMD	Various revisions of letter from Temporary Receiver to D. Spaes re: agreed upon expenses; forward copy to CFTC	.60	357.00
9/25/23	MMD	Call with A. Sodono and S. Placona re: status of various issues and intended responses	.60	357.00
9/25/23	MMD	Address issues relating to website, including revised message (e-mail to D. Spaes re: same), security issues and reports; discuss with Temporary Receiver and coordinate with C. Gallo; review initial report generated from website inquiries	.50	297.50
9/25/23	MMD	Revise, finalize and serve response to chargeback issues	.50	297.50
9/25/23	MMD	Follow up call with A. Sodono and S. Placona post-call with Defendants' counsel	.30	178.50
9/25/23	SBP	Call with M Dudas and A Sodono regarding follow up call with D Speas	.30	178.50
9/25/23	SBP	Call with Dakota Speas, A Sodono and M Dudas re expenses and chargebacks	1.30	773.50
9/25/23	SBP	Call with A Sodono re agenda items	.30	178.50
9/25/23	SBP	Call with A Sodono and M Dudas re expenses and chargebacks	.60	357.00
9/25/23	SBP	Call with CFTC, A Sodono and M Dudas Re expenses and chargebacks	.50	297.50
9/26/23	WB	Set up computer and email settings, read and answered emails/analyze data/claims.	.50	25.00
9/26/23	AS1	Communicate with Michele M. Dudas re WooCommerce website and status	.20	139.00
9/26/23	AS1	Communicate with Connect One, Ascendia Bank, and E. Daucher re Coinbase and funds transfer	.30	208.50
9/26/23	AS1	Communicate with Michele M. Dudas and D. Speas re control chargebacks	.20	139.00
9/26/23	AS1	Teams call with Michele M. Dudas, Sari B. Placona, E. Daucher, J. Colpeland, and E. Cobb re status/strategy	.80	556.00
9/26/23	AS1	Draft email to Michele M. Dudas and Sari B. Placona re expenses, equity and exemption, payments, memo of status	.30	208.50
9/26/23	AS1	Communicate with Colin Gallo re website configuration	.30	208.50
9/26/23	AS1	Review CFTC email to defends re discovery	.20	139.00
9/26/23	MMD	Call with Norton Rose re: status of various issues, including set up of bank accounts, turnover of Confirмо funds and status of OSC issues	.90	535.50
9/26/23	MMD	Review initial report from Stripe re: chargebacks; forward to Temporary Receiver and S. Placona with comment	.30	178.50
9/26/23	MMD	Call with K. Paulson and E. Streit, CFTC re: expense issues; relay information to Temporary Receiver and S. Placona; e-mail to D. Speas re: same	.80	476.00



Date	Atty	Description	Hours	Amount
9/26/23	MMD	Begin drafting Consent Order relating to Stripe issue	.80	476.00
9/26/23	MMD	Review correspondence from counsel to Defendants re: disclosure of additional financial accounts and websites, compare with previously disclosed information; coordinate with C. Gallo re: GoDaddy issues	.30	178.50
9/26/23	MMD	Call with Temporary Receiver re: status; revise response to chargeback issues	.50	297.50
9/26/23	MXT	Review revised release.	.30	81.00
9/26/23	SBP	Review letter from CFTC to Quinn Emanuel re production	.10	59.50
9/26/23	SBP	Communicate with ConnectOne re Receiver bank account	.10	59.50
9/26/23	SBP	Review email from CFTC to Akerman re document production	.10	59.50
9/26/23	SBP	Update chart of complaints from customer emails	.10	59.50
9/26/23	SBP	Review emails to/from D Speas re chargebacks and expenses	.20	119.00
9/26/23	SBP	Review email from M Tucci re Woo Commerce	.10	59.50
9/26/23	SBP	Team meeting with Norton Rose	.90	535.50
9/26/23	SBP	Review deposition notices sent by CFTC	.20	119.00
9/26/23	SBP	Call with A Sodono and M Dudas re expenses	.40	238.00
9/26/23	SBP	Review email from A Burden to defendants' counsel re status	.10	59.50
9/26/23	SBP	Review CFTC response to Stripe motion to intervene	.20	119.00
9/26/23	SBP	Review response by CFTC to motion to modify SRO	.20	119.00
9/26/23	SBP	Review task list with Norton Rose	.10	59.50
9/27/23	WB	Meeting with Sari, reviewed website submissions excel sheet lines #1-#620.	2.60	130.00
9/27/23	AS1	Call with Michele M. Dudas, Sari B. Placona, K. Paulson, B. Streit, and D. Speas re freeze orders	.40	278.00
9/27/23	AS1	Call with Norton Rose re OSC freeze order and relief with OSC for contractors	.40	278.00
9/27/23	AS1	Analyze defendants' brief and exhibits for emergent order; discuss with Michele M. Dudas and Sari B. Placona	.70	486.50
9/27/23	AS1	Call with OSC and Norton Rose re emergent relief	.30	208.50
9/27/23	AS1	Review H. Wong email re OSC R. 126 issue	.30	208.50
9/27/23	AS1	Zoom with Norton Rose re crypto wallet, transfer, and Coinbase	.40	278.00
9/27/23	AS1	Communicate with Sari B. Placona re preliminary injunction hearing and witnesses	.30	208.50
9/27/23	AS1	Communicate with various parties re chargebacks and consent order	.30	208.50
9/27/23	AS1	Communicate with E. Daucher re Coinbase account setup and transfer	.20	139.00
9/27/23	CG	Emails re: website security	.50	117.50
9/27/23	CG	Configure and test automated daily and weekly reporting. (Actual time 3.00)	1.50	352.50
9/27/23	MMD	Call with D. Speas, A. Sodono and S. Placona re: various issue, including clarification of exemptions/expenses	.90	535.50



Date	Atty	Description	Hours	Amount
9/27/23	MMD	Draft proposed Consent Order and revise Temporary Receiver's e-mail re: expense carveouts	1.20	714.00
9/27/23	MMD	Begin review and analysis Reply filed by Defendants to Opposition to modification of SRO; relay comments to Temporary Receiver	.80	476.00
9/27/23	MMD	Calls with Linda Fuerst, Norton Rose, Hansen Wong, OSC, Temporary Receiver and S. Placona re: OSC position on freeze directive's impact on American TGG funds; draft Application to OSC and forward to Canadian counsel with comment; provide updates on outcome of discussions with OSC to counsel to Defendants and CFTC	1.60	952.00
9/27/23	MMD	Revise, finalize and circulate proposed Stipulation and Consent Order resolving Stripe issue; draft e-mail to counsel re: same; review Defendants' counsel's comments to same and Temporary Receiver response	.80	476.00
9/27/23	MMD	Call with E. Streit, K. Paulson, D. Speas, Temporary Receiver re: carve-out issues relating to Stripe Order; discuss with A. Sodono and S. Placona post-call; coordinate with Norton Rose re: reciprocity and related issues with OSC	.70	416.50
9/27/23	MMD	Review issues relating to security of redirected website and respond to counsel to Defendants; coordinate with C. Gallo re: additional disclosed websites from GoDaddy	.40	238.00
9/27/23	SBP	Review emails with Confirмо account	.10	59.50
9/27/23	SBP	Call with Dakota Speas, A Sodono and M Dudas re expenses	.80	476.00
9/27/23	SBP	Call with CFTC, D Speas, A Sodono and M Dudas re chargeback consent order and OSC view on expenses	.30	178.50
9/27/23	SBP	Call with Norton Rose, A Sodono and M Dudas re Stripe and Ontario Counsel position	.20	119.00
9/27/23	SBP	Call with OSC, Norton Rose, A Sodono and M Dudas	.30	178.50
9/27/23	SBP	Call with A Sodono and M Dudas re strategy	.20	119.00
9/27/23	SBP	Review consent order re Stripe chargebacks	.20	119.00
9/27/23	SBP	Draft letter to Judge Quarishi re PI hearing	.20	119.00
9/27/23	SBP	Review reply to opposition to motion to modify SRO	.20	119.00
9/27/23	SBP	Review email from D Speas re depositions; review emails re chargebacks and expenses; review chargeback disputes	.50	297.50
9/27/23	SBP	Call with W Baumann re website submission review	.20	119.00
9/28/23	WB	Reviewed website submissions excel sheet/analyze allegations	2.90	145.00
9/28/23	AS1	Review and revise chargeback order; discuss with Michele M. Dudas, Sari B. Placona, and D. Speas	.70	486.50
9/28/23	AS1	Analyze letter to OSC re alternative route to obtain permission to pay contractors; discuss with Norton Rose	.40	278.00
9/28/23	AS1	Communicate with L. Feurst re OSC letter and amendments	.20	139.00
9/28/23	MMD	Attempt to access additional disclosed bank accounts; draft e-mail to Defendants' counsel re: two factor authentication	.60	357.00



Date	Atty	Description	Hours	Amount
9/28/23	MMD	Revise cover letter to D. Speas re: budgeted expenses; forward to temporary receiver	.50	297.50
9/28/23	MMD	Call with Canadian counsel, A. Sodono and S. Placona re: status of revising freeze directives and related issues	.50	297.50
9/28/23	MMD	Review numerous revisions to Stripe Order; finalize for filing; coordinate with Canadian counsel and provide copy; review revised letter to OSC re: request for carve-out from frozen funds	1.10	654.50
9/28/23	MMD	Review informal Motion for protective order by Defendants	.20	119.00
9/28/23	SBP	Call with chambers re reply to motion to modify SRO	.10	59.50
9/28/23	SBP	Review email from H Wong re freeze directive	.10	59.50
9/28/23	SBP	Call with CFTC re PI hearing	.20	119.00
9/28/23	SBP	Discuss consent order re chargebacks with A Sodono and M Dudas; review redline changes of multiple versions	.30	178.50
9/28/23	SBP	Review email from A Burden re depositions	.10	59.50
9/28/23	SBP	Review emails re chargebacks, expenses, SRO; review emails from customers re complaints and update spreadsheet re same; review letter from CFTC to defendants re discovery	.70	416.50
9/28/23	SBP	Review defendants' response to receiver subpoenas	.20	119.00
9/28/23	SBP	Zoom team call with Norton Rose re OSC	.20	119.00
9/29/23	WB	Reviewed website submissions excel sheet	.90	45.00
9/29/23	AS1	Communicate with ConnectOne re opening account; review agreement; execute W-9 and documents; discuss sweep protection with Eddie	.40	278.00
9/29/23	AS1	Review A. Staltari letter with D. Speas certification re protection order	.30	208.50
9/29/23	AS1	Review multiple emails with L. Feurst re joint stipulation and order for approval with OSC for contractor payments	.30	208.50
9/29/23	MMD	Review entered Stripe Stipulation and issues surrounding same	.20	119.00
9/29/23	MMD	Review e-mails re: Kazmi deposition; and Defendants' position on production	.20	119.00
9/29/23	SBP	Review CFTC responses to Defendants discovery	.20	119.00
9/29/23	SBP	Review and analyze Defendants' response to subpoenas; review emails re OSC consent re chargebacks	.60	357.00
9/29/23	SBP	Review defendants' request for a protective order	.20	119.00
9/30/23	WB	Reviewed website submissions excel sheet. corresponding emails.	.80	40.00
9/30/23	SBP	Draft response to defendants reply to modify SRO; draft certifications in support of same	2.10	1,249.50
10/01/23	AS1	Review D. Speas email re WooCommerce; discuss with Michele M. Dudas	.20	139.00
10/01/23	AS1	Communicate with Michele M. Dudas and Sari B. Placona re report to court and response to letter brief	.20	139.00
10/01/23	AS1	Call with Will Baumann re analysis of spreadsheet and highlight concerns of refunds and untoward acts	.20	139.00



Date	Atty	Description	Hours	Amount
10/01/23	AS1	Review Forex settlement	.20	139.00
10/01/23	AS1	Work with L. Fuerst re application to OSC	.30	208.50
10/02/23	WB	Reviewed website submissions excel sheet. corresponding emails. research on MFF.	5.00	250.00
10/02/23	MMD	Review issues relating to chargebacks and initial invoice of contractors, relay memo to Temporary Receiver re: same; call with D. Speas, I. Sun, A. Sodono and S. Placona re: chargebacks and related issues	.60	357.00
10/02/23	MMD	Call with D. Speas re: two factor authentication for access to additional bank accounts; conduct searches of Citizen's Bank, Deel and Wise	1.70	1,011.50
10/02/23	MMD	Review CFTC Opposition to Defendants' Motion for protective order	.20	119.00
10/02/23	MMD	Call with Norton Rose, Temporary Receiver and S. Placona re: OSC issues; continue call with J. Copeland and S. Placona re: Coinbase account setup	.50	297.50
10/02/23	MMD	Draft e-mail circulating proposed Consent Order regarding initial expenses	.20	119.00
10/02/23	SBP	Revise SRO to update receiver bank accounts order	.20	119.00
10/02/23	SBP	Review emails re foreign recognition of SRO	.20	119.00
10/02/23	SBP	Review 9/30/23 dispute submissions for chargebacks	.20	119.00
10/02/23	SBP	Call with Norton Rose, A Sodono and M Dudas re Coinbase application and OSC freeze directives	.50	297.50
10/02/23	SBP	Zoom call with D Speas, M Dudas and A Sodono re expenses and chargebacks	.60	357.00
10/02/23	SBP	Review CFTC response to protective order	.20	119.00
10/02/23	SBP	Draft response to defendant's reply to modify SRO	.30	178.50
10/03/23	WB	Reviewed website submissions excel sheet. Corresponding emails. (Actual time 5.00)	3.50	175.00
10/03/23	WB	Curated a spreadsheet with samples of claims that stood out the most. Corresponding emails to team.	1.00	50.00
10/03/23	AS1	Communicate with Michele M. Dudas and review Wise account information/63K USD, transaction record	.30	208.50
10/03/23	AS1	Review email from creditor Csupot Aron re disputes with Traders Global	.20	139.00
10/03/23	AS1	Communicate with M. Carver re refund and claims	.20	139.00
10/03/23	AS1	Communicate with R. Haider re pay end report	.20	139.00
10/03/23	AS1	Communicate with W. Baumann re analysis of spreadsheet, identifying "unusual" claims and trading issues; analyze spreadsheet	.30	208.50
10/03/23	AS1	Communicate with D. Speas re expense order	.20	139.00
10/03/23	AS1	Communicate with L. Feurst re application to OSC re auth. payment funds and freeze order	.20	139.00
10/03/23	DP	Revise, finalize, and e-file proposed Order re TR's financial accounts	.30	70.50
10/03/23	MMD	Draft chart of known assets for presentment to OSC; review all information in file	2.10	1,249.50



Date	Atty	Description	Hours	Amount
10/03/23	MMD	Review response of CFTC re: carve-out order	.10	59.50
10/03/23	MMD	Provide Temporary Receiver with analysis of additional financial accounts disclosed by Kazmi	.70	416.50
10/03/23	MMD	Review proposed changes to proposed OSC Order by special counsel	.10	59.50
10/03/23	MMD	Review e-mails from D. Speas re: contractor-related issues; e-mail to Temporary Receiver re: same	.20	119.00
10/03/23	SBP	Review email report re chargebacks; email D Speas re email to send reports to	.20	119.00
10/03/23	SBP	Review email re Citizen Bank accounts	.10	59.50
10/03/23	SBP	Review 9/30/23 report of chargeback review	.10	59.50
10/03/23	SBP	Review draft consent order for OSC to release funds	.10	59.50
10/03/23	SBP	Email with LFuerst re OSC order for freeze directives	.10	59.50
10/03/23	SBP	Draft response to defendants' reply to modify SRO; review emails to / from D Speas Re requests; draft certification in support of same	3.70	2,201.50
10/04/23	WB	Reviewed website submissions excel sheet, noted prominent claims for reporting to team.	2.00	100.00
10/04/23	AS1	Review L. Fuerst emails to CFTC and OSC re OSC and expense	.20	139.00
10/04/23	AS1	Analyze known asset list; discuss with Michele M. Dudas and L. Fuerst	.20	139.00
10/04/23	AS1	Call with Michele M. Dudas and Sari B. Placona re call with CFTC	.40	278.00
10/04/23	AS1	Call with Michele M. Dudas, Sari B. Placona, and L. Fuerst re expense order and freeze order	.20	139.00
10/04/23	AS1	Review R. Haider day-end report; communicate with Sari B. Placona and Michele M. Dudas re addressing refund issue	.20	139.00
10/04/23	AS1	Communicate with L. Fuerst re expenses and orders to allow payment to defendants	.20	139.00
10/04/23	DP	Review emails from ConnectOne and Ascendia; communicate with Anthony Sodono, III, and Sari B. Placona re Receiver's accounts	.20	47.00
10/04/23	MMD	Review pleadings in support of SRO to confirm all assets referenced are included in list of assets; finalize asset lists and forward to special counsel with comment re: presentment to OSC	1.80	1,071.00
10/04/23	MMD	Review proposed comments by Defendants to Stipulation re: expenses; call with CFTC and S. Placona re: same; relay information to Receiver; call with L. Fuerst, Norton Rose, re: position of OSC and draft e-mail re: expense issue; review information relating to outcome of call with OSC and draft response	2.10	1,249.50
10/04/23	MMD	Review inquiries received by OSC from special counsel re: lifting of freeze directives as it relates to Temporary Receiver; draft response	1.10	654.50
10/04/23	SBP	Call with A Sodono and M Dudas re expenses; follow up call with L Fuerst re same	.80	476.00
10/04/23	SBP	Call with M Dudas and CFTC re expenses	.30	178.50
10/05/23	AS1	Communicate with E Daucher re Coinbase and funds transfer	.20	139.00



Date	Atty	Description	Hours	Amount
10/05/23	AS1	Draft email to D. Speas re expense, OSC issue, and payments to contractors	.20	139.00
10/05/23	AS1	Review communication between M. Kelly and all parties re iSAM sec. credentials; discuss with Michele M. Dudas	.30	208.50
10/05/23	AS1	Review H. Wong emails re questions; communicate with L. Fuerst re answers	.20	139.00
10/05/23	AS1	Communicate with L. Fuerst re justification for expense to OSC; draft email	.30	208.50
10/05/23	AS1	Communicate with L. Fuerst re new defendants' counsel and strategy re getting defendants' expenses paid	.30	208.50
10/05/23	DP	Revise, finalize, and e-file letter in support of proposed order re financial accounts	.20	47.00
10/05/23	DP	Compile documents and preparing index and binder with Defendants' brief and declarations (and exs.) in further support of motion to modify SRO	.30	70.50
10/05/23	MMD	Review various e-mails from special counsel re: OSC proceedings and issues relating to freeze order; make recommendations to Temporary Receiver re: same	1.60	952.00
10/05/23	SBP	Review email from is Risk counsel re access to chargeback platform	.10	59.50
10/05/23	SBP	Review defendant subpoena to M Edelstein	.10	59.50
10/05/23	SBP	Review emails re expenses; communicate with Norton Rose re insurance,	.20	119.00
10/06/23	AS1	Review ISAM securities subpoenas; discuss with Michele M. Dudas	.30	208.50
10/06/23	AS1	Communicate with L. Fuerst; review and revise OSC application	.30	208.50
10/06/23	MMD	Revise and continue drafting Response to Defendants' Reply to Motion to remove receiver	4.60	2,737.00
10/06/23	SBP	Review subpoena from defense to ISam Securities	.20	119.00
10/06/23	SBP	Draft response to court re motion to modify SRO	.80	476.00
10/07/23	WB	Reviewed website submissions excel sheet. Noted prominent claims for report to team. Corresponding emails to team. (Actual time 5.00)	2.50	125.00
10/07/23	MMD	Revise Reply; draft Certification and compile exhibit re: same	1.30	773.50
10/08/23	WB	Reviewed website submissions excel sheet. Noted prominent claims for report to team.	2.80	140.00
10/08/23	SBP	Review Defendants' subpoena to M. Chichester	.20	119.00
10/08/23	SBP	Review revised subpoena to M Edelstein	.10	59.50
10/08/23	SBP	Update customer complaint charts	.10	59.50
10/08/23	SBP	Review chargeback contractors report for week of October 3-8th	.20	119.00
10/08/23	SBP	Review website submissions for week of October 3rd - 8th by customer complaints	.20	119.00
10/08/23	SBP	Revise response to Defendants' reply to modify SRO; revise letter to court requesting leave	.60	357.00



Date	Atty	Description	Hours	Amount
10/09/23	WB	Reviewed website submissions excel sheet. Noted prominent claims for report to team.	2.70	135.00
10/09/23	AS1	Meeting with Michele M. Dudas and exchange multiple emails re expenses, chargebacks, website, two-factor ID, and negotiate for expenses with L. Fuerst and OSC	.60	417.00
10/09/23	DP	Review and update file with 10/6/2023 Orders (1) supplementing SRO re TR's financial accounts (Doc. No. 89) and (2) Order extending SRO through 11/8/2023; calendar relevant dates	.20	47.00
10/09/23	MMD	Participate in call with special counsel re: OSC expenses; follow up call with Temporary Receiver and S. Placona re: actions to be taken	.50	297.50
10/09/23	MMD	Review various requests for information by special counsel; review response of Temporary Receiver and provide additional information	.30	178.50
10/09/23	SBP	Review receiver website submissions; review chargeback report	.20	119.00
10/09/23	SBP	Team call with M Dudas and A Sodono Re open items	.60	357.00
10/09/23	SBP	Call with A Sodono, M Dudas, L Fuerst, J Copeland, and Ted Brook re expenses and OSC application	.30	178.50
10/09/23	SBP	Revise letter to court seeking leave to file response	.10	59.50
10/10/23	WB	Reviewed website submissions excel sheet. Noted prominent claims for report to team.	4.80	240.00
10/10/23	AS1	Work on reply brief; discuss with Michele M. Dudas and Sari B. Placona	1.10	764.50
10/10/23	AS1	Work on Anthony Sodono, III, certification	.20	139.00
10/10/23	AS1	Zoom meeting with D. Speas re various issues, chargebacks and expense order, OSC	.70	486.50
10/10/23	MMD	Confer with Temporary Receiver and S. Placona re: outcome of call with defense counsel re: chargebacks and expenses	.20	119.00
10/10/23	MMD	Revise and finalize Response to Defendants Reply to Motion to remove Temporary Receiver; discuss with A. Sodono and S. Placona	2.30	1,368.50
10/10/23	MMD	Review e-mail from counsel to Defendants re: changed password for BMO accounts; attempt access; respond to e-mail re: same	.30	178.50
10/10/23	MMD	Review various e-mails from special counsel re: OSC and related issues	.20	119.00
10/10/23	SBP	Zoom call with A Sodono and D Speas re expenses and chargebacks	.70	416.50
10/10/23	SBP	Revise response to reply to motion to modify SRO; file same	.30	178.50
10/10/23	SBP	Review chargeback invoice and daily report	.10	59.50
10/10/23	SBP	Draft response to defendants' letter re permission to file sur reply	.20	119.00
10/10/23	SBP	Review email from L Fuerst to OSC re fees, expenses, etc.	.10	59.50
10/10/23	SBP	Review letter from defendants re TR sur reply; discuss with A Sodono	.20	119.00
10/11/23	WB	Reviewed website submissions excel sheet. Noted prominent claims for report to team.	3.30	165.00
10/11/23	AS1	Communicate with L. Fuerst and analyze order re OSC freeze	.20	139.00



Date	Atty	Description	Hours	Amount
10/11/23	AS1	Communicate with E. Daucher re Coinbase account and onboarding wallt	.20	139.00
10/11/23	AS1	Communicate with Coinbase directly re client onboarding documents	.20	139.00
10/11/23	AS1	Communicate with A. Rose; review email	.20	139.00
10/11/23	AS1	Review Quinn letter; discuss with Michele M. Dudas and draft reply	.30	208.50
10/11/23	AS1	Review emails between CFTC and Defendants' counsel re R. 45 waiver production of Kazmi and Edelstein	.20	139.00
10/11/23	AS1	Review reply with Michele M. Dudas and Isabelle Sund re login passwords	.20	139.00
10/11/23	AS1	Call with Michele M. Dudas and Sari B. Placona re post-call with D. Speas re status of employees, payment and chargebacks	.20	139.00
10/11/23	MMD	Review e-mail response from Defendants' counsel re: BMO login; attempt login again and access accounts	.30	178.50
10/11/23	MMD	Review e-mails relating to notice to employees; discuss with Temporary Receiver; e-mail to D. Speas re: whether "staff" included "contractors"	.40	238.00
10/11/23	MMD	Call with Canadian and US counsel to Defendant, L. Fuerst, and S. Placona re: expenses	.60	357.00
10/11/23	MMD	Review and analyze all expenses and requested amounts provided by Defendants; compare with estimates from Canadian counsel; response	1.60	952.00
10/11/23	SBP	Zoom call with Defense counsel, M Dudas and Norton Rose re expenses	.60	357.00
10/11/23	SBP	Review daily chargeback report	.10	59.50
10/11/23	SBP	Review CFTC subpoena to Kazmi	.10	59.50
10/11/23	SBP	Review letter from D Speas to A Sodono re credit cards and chargebacks	.20	119.00
10/11/23	SBP	Review AIDE MEMOIRE OF ANTHONY SODONO, III, IN HIS CAPACITY AS TEMPORARY RECEIVER APPOINTED BY THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY for the Ontario court	.20	119.00
10/12/23	WB	Reviewed website submission excel sheet. Noted prominent claims for report to team.	3.60	180.00
10/12/23	AS1	Communicate with I. Fuerst re A. Rose communication of expenses	.20	139.00
10/12/23	AS1	Review opposition to joint motion for contempt	.20	139.00
10/12/23	MMD	Review various e-mails from special counsel re: expenses and OSC issues; review and revise e-mails and communicate with special counsel re: same	.50	297.50
10/12/23	MMD	Respond to Defendants' counsel re: credit card merchants and related chargeback issues; discuss with Temporary Receiver	.20	119.00
10/12/23	MMD	Review e-mail from Defendants re: expense payments; begin review of production by Defendants for additional financial information sought by CFTC	1.20	714.00
10/12/23	SBP	Review chargeback daily report and invoice	.20	119.00



Date	Atty	Description	Hours	Amount
10/12/23	SBP	Review emails re payments for mortgage and other assets	.20	119.00
10/13/23	WB	Reviewed website claim submissions. Noted prominent claims for report to team.	3.10	155.00
10/13/23	AS1	Review communication between A. Burden and D. Speas re expenses, tainted v. untainted	.20	139.00
10/13/23	MMD	Review and analyze Opposition of Defendants to Motion for Contempt and forward to Temporary Receiver with comment; review response regarding refusal of Mr. Kazmi to waive Rule 45 limits for appearance at hearing on preliminary injunction	.50	297.50
10/13/23	MMD	Review response of counsel to Defendants re: known credit card processors for TGG; begin research of legal departments for names provided	1.10	654.50
10/13/23	SBP	Review day 12 chargeback report and analysis	.20	119.00
10/13/23	SBP	Review email from L Fuerst re update on OSC application re freeze directives	.10	59.50
10/13/23	SBP	Review letter from D Speas re records; review and email same to Eisner	.20	119.00
10/13/23	SBP	Review OSC draft form of order for hearing	.10	59.50
10/13/23	SBP	Review email from D Speas re carve out with back up documentation re sales of properties	.30	178.50
10/13/23	SBP	Review emails from CFTC re interim carveout	.20	119.00
10/14/23	MMD	Review Temporary Receiver response to various issues, including newly disclosed 401(k) account, modified freeze directives issued, and related information	.30	178.50
10/15/23	MMD	Access and review Fidelity account; provide information to Temporary Receiver	.50	297.50
10/16/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team. Emails.	3.30	165.00
10/16/23	DP	Review letter from D. Speas with Defendants' financials/corporate documents; compile same and prepare binder and index	1.20	282.00
10/16/23	MMD	Review response from Canadian counsel regarding expenses; review revised submission by special counsel	.20	119.00
10/16/23	SBP	Review October 15th chargeback analysis and invoice	.20	119.00
10/16/23	SBP	Review email from A Burden re testimony at hearing	.10	59.50
10/16/23	SBP	Review Oct 13 and 14 chargeback analysis reports and invoices	.20	119.00
10/16/23	SBP	Review email from A Rose re expenses	.20	119.00
10/16/23	SBP	Review subpoenas to Johnson and M Chichester from CFTC	.20	119.00
10/16/23	SBP	Review Defendants' opposition to motion for contempt	.20	119.00
10/16/23	SBP	Draft letter to Fidelity re SRO	.20	119.00
10/16/23	SBP	Discuss Fidelity account with client	.10	59.50
10/17/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team.	4.60	230.00



Date	Atty	Description	Hours	Amount
10/17/23	AS1	Several emails with L. Fuerst to resolve expenses and order with OSC	.20	139.00
10/17/23	AS1	Analyze Coinbase Prime Agreement	.90	625.50
10/17/23	AS1	Review draft consent order; communicate with L. Fuerst re expenses and OSC authority	.30	208.50
10/17/23	AS1	Review communications between A. Burden and Defendants re subpoenas to Chichester and John Sutter	.20	139.00
10/17/23	AS1	Review day-end report	.10	69.50
10/17/23	MMD	Review e-mail from counsel to Defendants re: payment to contractors; draft response and present to Temporary Receiver	.50	297.50
10/17/23	MMD	Call with CFTC and S. Placona re: Defendants' compliance with disclosure of bank account information	.10	59.50
10/17/23	SBP	Review coinbase agreement to open account for TR	.10	59.50
10/17/23	SBP	Email D Speas re Subpoena to Quinn Emanuel	.10	59.50
10/17/23	SBP	Review CFTC letter regarding schedule for PI hearing	.10	59.50
10/17/23	SBP	Revise letter to Fidelity re funds and SRO	.10	59.50
10/17/23	SBP	Communicate with L. Fuerst re emails re expenses for OSC	.20	119.00
10/17/23	SBP	Review deposition notice to WooCommerce	.20	119.00
10/17/23	SBP	Review chargeback analysis and invoice	.20	119.00
10/17/23	SBP	Zoom meeting with CFTC and M Dudas re replay to contempt	.20	119.00
10/18/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team. Provided updated report to team.	3.80	190.00
10/18/23	AS1	Communicate with W. Baumann re spreadsheet comments and highlighting allegations	.30	208.50
10/18/23	AS1	Call with Accountants re transfer of share documents	.30	208.50
10/18/23	AS1	Review day-end report	.10	69.50
10/18/23	AS1	Communicate with Michele M. Dudas and D. Speas re chargeback costs	.20	139.00
10/18/23	AS1	Communicate with Michele M. Dudas re chargebacks (6 chargebacks)	.20	139.00
10/18/23	AS1	Communicate with Michele M. Dudas re response to S. Speas re contractor payments; work on draft reply	.30	208.50
10/18/23	AS1	Communicate with L. Fuerst (several communications) re expenses and prescriptions	.30	208.50
10/18/23	MMD	Finalize and serve response re: contractor chargebacks; review response of Defendants re: same	.20	119.00
10/18/23	MMD	Review demand for payment of TGG related expenses by D. Speas	.20	119.00
10/18/23	SBP	Review October 17 chargeback analysis and invoice	.20	119.00
10/18/23	SBP	Review email from D Speas re contractor payments	.10	59.50
10/18/23	SBP	Review revised deposition notice of Johnson	.10	59.50
10/18/23	SBP	Review email from D Speas re chargebacks	.10	59.50
10/18/23	SBP	Call with A Sodono and Eisner Amper re books and records	.80	476.00



Date	Atty	Description	Hours	Amount
10/19/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team. Provided updated report to team. Registered Paylocity account.	4.00	200.00
10/19/23	AS1	Review I sam letter; communicate with Michele M. Dudas re response to same	.30	208.50
10/19/23	AS1	Communicate with Michele M. Dudas re credit card email drafts to various parties	.50	347.50
10/19/23	MMD	Review e-mails relating expenses of Kazmi family for OSC issues; response of Temporary Receiver re: Defendant expenses	.20	119.00
10/19/23	MMD	Continue research of addresses for credit card companies; draft letters to AmEx, Visa, Mastercard, Union Pay and JCB in connection with request for stay of chargeback period	1.70	1,011.50
10/19/23	MMD	Review letter from Defendants' counsel re: request for supplemental briefing on release of funds	.50	297.50
10/19/23	SBP	Review amended notice of deposition and subpoena for WooCommerce	.20	119.00
10/19/23	SBP	Communicate with Coinbase re account	.10	59.50
10/19/23	SBP	Review october 18 chargeback analysis and invoice	.20	119.00
10/19/23	SBP	Review emails re expenses and Canadian counsel request of same	.20	119.00
10/19/23	SBP	Review letter from D Speas re invoice outstanding; review invoices	.20	119.00
10/20/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team.	4.00	200.00
10/20/23	AS1	Analyze website submissions	.20	139.00
10/20/23	AS1	Review D. Speas email re 401k fidelity account	.30	208.50
10/20/23	AS1	Discuss with Michele M. Dudas and Sari B. Placona re freeze letter	.30	208.50
10/20/23	AS1	Communicate with L. Fuerst re release of funds to pay defendant	.20	139.00
10/20/23	AS1	Communicate with E. Daucher re Coinbase account and turnover of crypto funds	.20	139.00
10/20/23	DP	Review orders and SRO and begin preparing motion and application for first interim fees to MS&B and NRF US and NRF CAN	1.40	329.00
10/20/23	MMD	Review and analyze "company" invoices and demand for payment made by counsel to Defendants; draft detailed response regarding same; call with Temporary Receiver re: same; draft letter to MetaQuotes regarding proceeding and request to preserve assets	2.30	1,368.50
10/20/23	MMD	Review Temporary Receiver response to request of Defendants to file supplemental brief re: modification of SRO; draft proposed letter to Court re: same	.80	476.00
10/20/23	MMD	E-mails to AmEx (and call), Discover, Union Pay and research Diners Club re: request for stay of chargebacks	1.20	714.00
10/20/23	MMD	Review and analyze Reply of CFTC to Opposition to Motion for Contempt	.20	119.00
10/20/23	SBP	Review 10/19/23 chargeback analysis and report	.20	119.00



Date	Atty	Description	Hours	Amount
10/20/23	SBP	Communicate with D Speas re subpoena to QE; finalize same	.20	119.00
10/20/23	SBP	Review reply brief to opposition to motion for contempt	.30	178.50
10/20/23	SBP	Review draft letter to Judge re Defendants' request for leave to file brief	.10	59.50
10/20/23	SBP	Review Defendants' letter for request for leave to supplement brief	.20	119.00
10/20/23	SBP	Draft report	.30	178.50
10/22/23	SBP	Review letter to court in response to Def request for leave to file brief	.10	59.50
10/22/23	SBP	Review 10/20 and 10/21 chargeback analysis and invoices	.20	119.00
10/23/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims to report to team. Registered Paylocity account.	2.80	140.00
10/23/23	AS1	Review and draft letter to Judge Quraishi re supplemental filing; discuss with Michele M. Dudas	.20	139.00
10/23/23	MMD	Revise and finalize letter to Judge Quraishi re: request to modify SRO	.20	119.00
10/23/23	MMD	Review report prepared by Eisner based upon review of TGG financials	.10	59.50
10/23/23	MMD	Review e-mail from special counsel re: OSC inquiries re: payment of expenses and responses provided	.20	119.00
10/23/23	MMD	Review e-mail and enclosures from CFTC re: delayed disclosure of information obtained by subpoena	.20	119.00
10/23/23	MMD	Review response of Defendants re: payments to contractors for chargeback work; draft proposed response to Temporary Receiver	.20	119.00
10/23/23	SBP	Review 10/22/23 chargeback report and invoice	.20	119.00
10/23/23	SBP	Draft Temporary Receiver report	2.40	1,428.00
10/23/23	SBP	Review letter from CFTC to counsel re subpoenas and lack of information	.10	59.50
10/24/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team.	2.60	130.00
10/24/23	AS1	Communicate with L. Fuerst re tuition payments, in-laws support payments	.20	139.00
10/24/23	AS1	Communicate with R. Hernandez of Discovery re credit card chargeback issues; discuss with Michele M. Dudas	.30	208.50
10/24/23	AS1	Review notices of deposition of Chichester, Johnson, Lam; discuss with Michele M. Dudas and Sari B. Placona	.20	139.00
10/24/23	AS1	Call with Michele M. Dudas and Sari B. Placona re chargebacks strategy, report per Local Rules, expenses, Generation ownership and distributions/salary	.40	278.00
10/24/23	MMD	Review e-mails from L. Fuerst, Norton Rose re: OSC response for expenses; provide recommendations to Temporary Receiver	.20	119.00
10/24/23	MMD	Begin research re: compelling credit card processors to extend stay of chargeback period	1.20	714.00
10/24/23	MMD	Draft response to D. Speas re: Traders Global Generation and payment of accounts payables of business entities; revise and finalize	.80	476.00



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Date	Atty	Description	Hours	Amount
10/24/23	MMD	Review e-mail from Discover re: additional information required for chargeback request; review information in file and respond, including addresses for all Defendants, Tax IDs for TGG, and Social Security No. for Kazmi	.50	297.50
10/24/23	MMD	Begin review and revision of status Report	.80	476.00
10/24/23	MMD	Confer with A. Sodono and S. Placona re: hearing date and actions to be taken	.50	297.50
10/24/23	SBP	Review Defendants' cross notice for depositions	.20	119.00
10/24/23	SBP	Review 10/23/23 invoice for chargeback	.10	59.50
10/24/23	SBP	Call with M Dudas and A Sodono re report	.20	119.00
10/24/23	SBP	Review emails re expenses, i.e. tuition	.20	119.00
10/24/23	SBP	Draft temporary receiver report	2.20	1,309.00
10/25/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims to report to team.	2.50	125.00
10/25/23	AS1	Communicate with L. Fuerst re various requests/expenses for freeze order	.20	139.00
10/25/23	DP	Email exchange with D. Lucas of Ascendia re receiver account	.10	23.50
10/25/23	MMD	Continue review and revision of status Report; continue compiling information for inclusion in same	2.30	1,368.50
10/25/23	MMD	Review entered orders in OSC action continuing restraints	.10	59.50
10/25/23	SBP	Review 10.24.23 chargeback report and invoice	.20	119.00
10/25/23	SBP	Review Ontario Capital Markets order	.20	119.00
10/26/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team.	3.60	180.00
10/26/23	AS1	Communicate with L Fuerst re private school invoice and tuition payments; negotiate with OSC	.20	139.00
10/26/23	AS1	Call with Court, Zink, Saltari, and K. Paulson re motions	.70	486.50
10/26/23	DP	Revise first interim fee application documents; prepare Certification of Service	.70	164.50
10/26/23	MMD	Participate in call with Court re: decision on pending Motions; confer with A. Sodono and S. Placona post-call re: actions to be taken; call with CFTC and S. Placona re: same	1.30	773.50
10/26/23	MMD	Revise status Report	2.10	1,249.50
10/26/23	SBP	Review CFTC letter to court re protective order	.10	59.50
10/26/23	SBP	Update customer complaint chart	.10	59.50
10/26/23	SBP	Review chargeback report and invoice for 10.25.23	.20	119.00
10/26/23	SBP	Review declaration of J Linares	.10	59.50
10/26/23	SBP	Review tuition expenses invoices	.10	59.50
10/26/23	SBP	Call with court on pending motions	.50	297.50
10/26/23	SBP	Call with A Sodono and M Dudas re court rulings	.30	178.50
10/26/23	SBP	Call with CFTC re court rulings	.20	119.00



Date	Atty	Description	Hours	Amount
10/26/23	SBP	Draft letter to court re order re new temporary receiver	.20	119.00
10/26/23	SBP	Call with L Fuerst re status of court hearing	.20	119.00
10/27/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team.	3.30	165.00
10/27/23	AS1	Review transcript of 10/26/2023 hearing	.30	208.50
10/27/23	AS1	Work on 60-day report	1.90	1,320.50
10/27/23	MMD	Finalize status Report and provide comment to Temporary Receiver; review Transcript	1.80	1,071.00
10/27/23	SBP	Review 10.26.23 chargeback analysis and invoice	.20	119.00
10/27/23	SBP	Review letter from CFTC re production	.10	59.50
10/27/23	SBP	Review amended notice of deposition of Lam	.10	59.50
10/29/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team. Corresponding emails.	1.70	85.00
10/30/23	WB	Reviewed website claim submissions excel sheet. Noted prominent claims for report to team. Emails.	4.80	240.00
10/30/23	AS1	Review day-end report	.10	69.50
10/30/23	AS1	Work on status report	1.90	1,320.50
10/30/23	AS1	Draft letter to Court re concerns	.60	417.00
10/30/23	DP	Email exchanges with A. Fishstein re wire transfer to Traders Global Generation (Pakistan); prepare wire transfer request form	.30	70.50
10/30/23	MMD	Revise Report, compile exhibits and finalize for filing; discuss with Temporary Receiver and S. Placona	1.60	952.00
10/30/23	SBP	Review 10.27.23 chargeback invoice and report	.20	119.00
10/30/23	SBP	Review 10.28.23 chargeback invoice and report	.10	59.50
10/30/23	SBP	Review email from Alex Rose re expenses	.10	59.50
10/30/23	SBP	Call with A Sodono and M Dudas re letter to Defense re temporary receiver and payment to contractors	.20	119.00
10/30/23	SBP	Revise letter to court re clarification of order	.20	119.00
10/30/23	SBP	Revise letter to court re clarification of order	.10	59.50
10/30/23	SBP	Draft email to defense counsel re temporary receiver	.20	119.00
10/30/23	SBP	Revise temporary receiver report	.60	357.00
10/31/23	AS1	Communicate with L. Fuerst re contrary orders; communicate with OSC and counsel	.20	139.00
10/31/23	MMD	Review and revise letter to Judge Quraishi re: OSC position; discuss with Temporary Receiver and S. Placona	.40	238.00
10/31/23	MMD	Review proposed response by L. Fuerst to Defendants' Canadian counsel re: expenses; discuss with Temporary Receiver and respond	.10	59.50
10/31/23	SBP	Review chargeback invoice and report from 10.29.23	.20	119.00
10/31/23	SBP	Review letter from CFTC re motion for SRO	.10	59.50
10/31/23	SBP	Revise letter to court re clarification of order	.20	119.00



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TOTAL PROFESSIONAL SERVICES	\$ 214,446.50
Less 20% Discount	<u>\$ -42,889.30</u>
NET PROFESSIONAL SERVICES	\$ 171,557.20

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
ANTHONY SODONO, III	101.00	695.00	70,195.00
JOSHUA H. RAYMOND	1.80	560.00	1,008.00
MICHELE M. DUDAS	115.20	595.00	68,544.00
GRANT W. MC GUIRE	.80	530.00	424.00
MALCOLM X. THORPE	9.70	270.00	2,619.00
SARI PLACONA	97.30	595.00	57,893.50
BAUMANN, WILL	83.50	50.00	4,175.00
DIANE PERROTTA	32.90	235.00	7,731.50
STACY LIPSTEIN	1.00	235.00	235.00
COLIN GALLO	6.90	235.00	1,621.50
Total	450.10		\$ 214,446.50